

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW HAMPSHIRE**

In Re: Brian Goodman, Sr.

Debtor

Case No.: 25-10233-*KB
Chapter 13

US Bank Trust, NA
Movant

v.

Brian Goodman, Sr.
Respondent

Hearing Date: 8/20/2025
Hearing Time: 10:00 A.M.

DEBTOR'S ANSWER AND OBJECTION
TO
MOVANT'S MOTION FOR RELIEF FROM AUTOMATIC STAY

NOW COMES the Debtor and Respondent in the above-captioned matter, Brian Goodman, Sr., by and through his Attorneys, Raymond J. DiLucci, P.A. and Answers and Objects to Movant's Motion for Relief from Automatic Stay and in support thereof says:

1. That the Respondent admits the allegations contained in paragraph 1.
2. That the Respondent admits the allegations contained in paragraph 2.
3. That the Respondent admits the allegations contained in paragraph 3.
4. That the Respondent admits the allegations contained in paragraph 4.
5. That the Respondent admits the allegations contained in paragraph 5.
6. That the Respondent admits the allegations contained in paragraph 6.
7. That the Respondent admits the allegations contained in paragraph 7.
8. That the Respondent admits the allegations contained in paragraph 8.
9. That the Respondent denies the allegations contained in paragraph 9 and states that he believes payments were made.

10. That the Respondent admits the allegations contained in paragraph 10.
11. That the Respondent admits the allegations contained in paragraph 11 regarding the fair market value, however, lacks sufficient knowledge to admit or deny the allegations regarding the liquidation value.
12. That the Respondent admits the allegations contained in paragraph 12.
13. That the Respondent lacks sufficient knowledge to admit or deny the allegations contained in paragraph 13 as the Proof of Claim stated the outstanding balance was \$156,210.36 as of the filing date.
14. That the Respondent lacks sufficient knowledge to admit or deny the allegations contained in paragraph 14.
15. That the Respondent neither admits nor denies the allegations contained in paragraph 15.
16. That the Respondent admits the allegations contained in paragraph 16 match the information on the Proof of Claim.
17. That the Respondent denies the allegations contained in paragraph 17.

WHEREFORE, the Respondent respectfully request that this Honorable Court:

- A. Deny Movant's Motion for Relief from Automatic Stay; and
- B. For such other and further relief as is deemed fair, just and equitable.

Respectfully submitted,
Brian Goodman, Sr.
By and through his Attorney,

Dated: August 13, 2025

/s/ Kathleen E. McKenzie, Esq.
Kathleen E. McKenzie, Esquire
BNH 07628
Raymond J. DiLucci, P.A.
81 South State Street
Concord, NH 03301
Tel: (603) 224-2100